

THE LAW OFFICES OF SEAN M. MAHER, PLLC

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April 24, 2024

VIA ECF

MEMO ENDORSED

Hon. Kenneth M. Karas  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Chellel et al.* (Indigo Grant), 21 Cr. 441 (KMK)  
Travel request for Defendant Indigo Grant

Dear Judge Karas:

On behalf of defendant Indigo Grant, I write to request permission for Ms. Grant to travel from Atlanta to South Carolina from April 26-28, 2024.

Ms. Grant is on pretrial release on conditions including location monitoring. She lives in Atlanta and has been directly supervised by Pretrial Services Officer Ben Heath from the Northern District of Georgia. Ms. Grant would like to travel to South Carolina this weekend. Her children currently are visiting with their grandparents in Conway, South Carolina, which is near Myrtle Beach, South Carolina. The specific Conway address has been provided to the government and the Pretrial Services Office. Ms. Grant requests to drive to Conway, South Carolina this Friday, 4/26. She would like to spend Saturday on the beach at Myrtle Beach, South Carolina with her children and their grandparents, and then drive back home with her kids on Sunday, 4/28. She will stay at the Conway address, except when at the beach on Saturday.

I have emailed with PTS Officer Ben Heath in Georgia and PTS Officer Leo Barrios here in our District. PTS Off. Heath informs me that he has no objection to Ms. Grant's travel request; I have not heard directly from PTS Off. Barrios. I have communicated this request to the government and have been informed by AUSA Nicholas Bradley that the government objects to Ms. Grant's travel request.

The Court's consideration is greatly appreciated.

Application to travel this weekend to South Carolina to, among other things, be on the beach, is denied. First, the request is untimely, as it was filed barely two days before the requested travel. Second, it is non-essential travel and given Defendant's prior history of dishonesty about her travel and the flight risk she presents, the trip will not be approved.

Respectfully submitted,

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/S/  
Sean M. Maher  
Counsel for Indigo Grant

So Ordered. 4/25/24



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cc: All counsel via ECF